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September 11, 2019

Via ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Joseph Meli, et al., 19 Cr. 480 (RA)

Dear Judge Abrams:

I represent Joseph Meli in the above-referenced matter pursuant to the Criminal Justice Act. I write to request that the Court authorize the appointment of Valerie Gotlib, of counsel to my firm, *nunc pro tunc*, to assist me in representing Mr. Meli in this matter.

As the Court is aware, Mr. Meli is charged with crimes stemming from his alleged involvement in an alleged securities and wire fraud conspiracy. Ms. Gotlib is necessary to assist me in this case, which has voluminous discovery.

I am highly conscious of needlessly expending CJA funds. Consistent with the goal of conserving resources, I firmly believe that the appointment of Ms. Gotlib in this case will result in substantial savings by relieving me from performing tasks that would be more expensive due to my higher billing rate.

Ms. Gotlib has been appointed to assist me on multiple CJA matters in this district and the Eastern District of New York and is very familiar with the mandates and obligations for CJA appointed counsel. In January 2019, Ms. Gotlib was appointed to the CJA Panel for the Southern District of New York. Since September 3, 2019, Ms. Gotlib has devoted less than two hours to Mr. Meli's case.

Accordingly, I respectfully request that Your Honor execute the enclosed Proposed Order authorizing the appointment of Ms. Gotlib *nunc pro tunc* to September 3, 2019 at a rate of \$110 per hour. Thank you for your continued attention to this matter.

Respectfully submitted,

/s/

César de Castro

Encl.

Cc: All counsel of record (*via* ECF)